

041912/19344/MHW/JJL

**UNITED STATES DISTRICT COURT**  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MICHAEL COLEMAN,

Plaintiff,

v.

Defendant, GHALIAH OBAISI, Independent  
Executor of the Estate of Saleh Obaisi, M.D.  
Deceased,

Defendant.

Case Number 16-cv-4917

Judge Edmond E. Chang

**DEFENDANTS' FED. R. CIV. P. 26(A)(2)(B) EXPERT WITNESS DISCLOSURES**

NOW COMES Defendant, GHALIAH OBAISI, Independent Executor of the Estate of Saleh Obaisi, M.D. Deceased, by and through her attorneys, Matthew H. Weller and Joseph J. Lombardo of CASSIDAY SCHADE LLP, and pursuant to Fed. R. Civ. P. 26(a)(2)(B), Defendant identifies the following:

Chadwick C. Prodromos, M.D.

- (i) Attached hereto is a written report prepared and signed by Dr. Prodromos. The report contains a complete statement of all opinions Dr. Prodromos will express, as well as the bases and reasons for these opinions. Dr. Prodromos is expected to rely upon his review of the records provided to him, as well as his experience, knowledge, training and education, as a basis for his opinions in this matter. Dr. Prodromos is expected to testify consistent with the opinions contained within his report and those opinions that will be further rendered to explain any portion of the written report, as well as any opinions or basis and reasons for those opinions elicited during his deposition in this matter, if taken.
- (ii) In forming his opinions, Dr. Prodromos reviewed records the materials identified in his report, a copy of which is in already in possession of all counsel of record.
- (iii) Dr. Prodromos may use any of the materials he reviewed, any of the documents listed in his report, as well as photographs, charts, graphs, and demonstrative exhibits to summarize or support his opinions at the trial of this matter. The specific items are identified in the report, and will be identified and produced pursuant to the Court's scheduling order and prior to the pre-trial of this matter.

- (iv) A copy of Dr. Prodromos' current curriculum vitae is attached as "Exhibit 1" of his report. Any articles that Dr. Prodromos has authored that have been published in the previous 10 years are identified in Dr. Prodromos' curriculum vitae.
- (v) Dr. Prodromos has not maintained a list of cases in which he has been deposed or testified at trial within the past four years, as he has testified as a retained expert only a few times throughout his career, and believes he testified only one time within the past four years in a Cook County, Illinois worker's compensation matter, Cuadrano, Luis v. F.H. Paschen, et al., 11 wc 045776; and Burton v. Ghosh, et al.; 12-cv-08443 (N.D. Ill.).
- (vi) Dr. Prodromos charges \$500 per hour to review records and \$1,000 per hour of deposition testimony and/or trial testimony.

Defendant reserves the right to supplement this disclosure as discovery continues and additional information becomes known or available.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ *Joseph J. Lombardo*

One of the Attorneys for Defendant,  
GHALIAH OBAISI, Independent Executor of  
the Estate of Saleh Obaisi, M.D. Deceased

**CERTIFICATE OF SERVICE**

I hereby certify that on October 19, 2018, I electronically served the attached via email to all counsel of record.

/s/ Joseph J. Lombardo

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